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October 4, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: NexGen Global Technologies, LLC

Dear Ms. Dortch:

On Thursday, September 29, 2016, Michael Romano as CEO of NexGen Global Technologies, LLC, and I had a telephone conference call with David Siehl and Timothy May of the Public Safety and Homeland Security Bureau. This call was in reference to matters reflected in Text to 911 agendas, 10-255 and 11-153.

During this conversation, we discussed an email that had been previously forwarded to David Siehl by the undersigned, a copy of which is attached to this letter. In that email, AT&T, as one of the carriers providing text to 911 services to Union County, North Carolina area was responding to Larry Brinker, the Director of that operation. As shown, AT&T refused the request of this public safety agency to forward MMS (Multi Media such as video, etc.) to the 911 provider, notwithstanding the fact that the text to 911 capacity for Union County can handle MMS.

In addition, we advised Messers Siehl and May that both Verizon and T-Mobile were also declining to deliver MMS also in response to a direct request from Union County. We

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further advised that Sprint is currently delivering MMS to the West/Intrado TCC but that they did not have the capacity to forward it on to the PSAP (911 Center).

As we outlined during this conversation, the capacity to forward MMS on a text to 911 system would greatly improve the ability of public safety responders to deal with emergency situations such as the recent tragedy in Orlando, Florida.

It was explained to us that the current rules are very specific and that they require the carriers to support text only, with no requirement to support MMS. It is clear that a rule change to require the support of the transmission of MMS is extremely critical to meet the public safety needs of the United States.

At the end of our call, we advised Messers Siehl and May that we would arrange a future conference call with several public safety officials in order to convey firsthand the urgent nature of this problem.

Sincerely



Ralph V. Hadley III

RVH/gm

Enclosures

cc: Timothy May (timothy.may@fcc.gov)
David Siehl (david.siehl@fcc.gov)
Michael Romano (mromano@nggt.us)

Ralph Hadley

From: Ralph Hadley
Sent: Thursday, September 22, 2016 4:42 PM
To: 'David Siehl'; Timothy May
Cc: 'mromano@nggt.us'; 'Peggy DeFilippo'
Subject: FW: Text to 911 MMS

Good afternoon David.

I am delighted to report to you that NexGen Global Technologies has successfully installed in Union County the fully functional text to 911 program. We have successfully brought up and are operational with AT&T, Sprint, Verizon, and T-Mobile through their respective TCC's. Upon completing the install of this technology, the division director of emergency communications requested that these carriers stop stripping the MMS portions being submitted to them. In a string of emails below, you can see the request submitted by Larry Brinker and the response from AT&T. At the present time, Sprint is actually working with us to try and install this capability, but clearly AT&T is not willing to make any effort. I wonder if you and Tim might be available for a call someday next week to discuss how we go forward from this point. Specifically, on behalf of the public safety entities with whom we are working, this is a critical matter as it involves the ability to save lives and provide the first responders with very significant information. Think about what this would mean if our technology had been successfully installed in Orlando this summer. Bottom line, we have the technology, and it has been successfully installed and the public safety agencies need the help of the federal government. I think this makes a compelling case to move the texting function under title II as previously discussed.

The one day that I am not available next week is Wednesday as I will be fighting the IRS on behalf of a client. Please let me know if there's a time that is good for you folks. Thanks.

Best regards,
Terry

Ralph V. Hadley, III
407-647-2777

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Thanks

Ralph V. Hadley, III
407-647-2777

From: Larry Brinker [mailto:larry.brinker@unioncountync.gov]
Sent: Tuesday, September 6, 2016 3:28 PM
To: Terry Hadley <thadley@swannhadley.com>
Subject: FW: Text to 911 MMS

Larry Brinker

Division Director, Emergency Communications
Union County
500 N. Main Street
Monroe, NC 28112
(704) 283-3550
(980) 239-1328
larry.brinker@co.union.nc.us

www.unioncountync.gov



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From: MUSE, ALLEN [mailto:bm3668@att.com]
Sent: Tuesday, September 06, 2016 15:09
To: Larry Brinker
Cc: Cody Odom
Subject: RE: Text to 911 MMS

Mr. Brinker,

We are glad that your text (SMS) to 9-1-1 service is satisfactory and we were happy to cooperate with you on this important public safety project.

Unfortunately, extending your service to include the transmission of video and photos by MMS is not available at this time.

Our standards team indicates that this capability has not been standardized yet and our review of the FCC regulations indicates this is not a requirement at present.

As the relevant wireless 911 regulations evolve to include this functionality, we look forward to working with you in the future.

Allen Muse, ENP
Public Safety Relations Manager
AT&T Mobility
(205) 909-9645 office
(615) 828-3099 mobile

- Texting and Driving: It Can Wait. Take the pledge today and pass it on.

From: Larry Brinker [<mailto:larry.brinker@unioncountync.gov>]

Sent: Friday, August 19, 2016 2:05 PM

To: MUSE, ALLEN <bm3668@att.com>

Cc: JOHNSON, AUDREY <JA1464@att.com>; VALENTINE, FATIMA J (Legal) <fn413j@att.com>; E911 RFS CCB <E911RFSCCB@att.com>

Subject: Text to 911 MMS

Mr. Muse,

Union County, North Carolina has concluded its TCS TCC testing with Verizon and is successfully able to receive text-2-911 SMS messages. As stated before, we are looking for including video and photos through our web-based solution NexGen Global Technologies. During a conversation yesterday, the FCC has advised us to request to contact the carriers direct and request that they stop stripping the MMS being sent to 911 for our location.

This is a formal request to have Verizon begin delivery of MMS messaging (photos and videos) to the COMTECH TCS TCC so that this TCC can pass them on to the NexGen's private ESInet and in turn deliver MMS messages to Union County, North Carolina. Thank you for your assistance.

Larry Brinker

Division Director, Emergency Communications

Union County

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